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6 Attorneys for Defendant, **Teamsters Local Union No. 948**

7
8 UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 RICHARD CUEVAS, DANIEL ABRIL, JOHN
HAILSTONE, AL T. OLIVER, CHARLES K.
12 WILLIAMS, SHARON MOSLEY,

13 Plaintiffs,

14 v.

15 JOINT BENEFIT TRUST AND TEAMSTERS
LOCAL UNION NO. 948,

16 Defendants.
17
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No. C 13 0045-JST

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES**

19
20 Whereas, on April 10, 2013, the Court entered an Order (Document 20) setting fact
21 discovery cutoff on August 16, 2013, expert disclosures on October 4, expert rebuttal disclosures
22 on November 1, and expert discovery cutoff on November 22;

23 Whereas, the deadline to file dispositive motions is not until January 24, 2014, and trial is
24 scheduled on April 28, 2014, allowing sufficient time that a 60-day extension of the discovery
25 deadlines would not require a change in the trial date;

26 Whereas, on June 25, 2013, Defendant Teamsters Local 948 filed a motion to disqualify
27 Plaintiffs' counsel, on the grounds that Plaintiffs' counsel formerly represented Defendant and
28 Defendant contends that Plaintiffs' counsel has a conflict, and that motion is scheduled to be

1 heard on August 29, 2013;

2 Whereas, Plaintiffs seek to take the depositions of officers and employees of Defendant,
3 and Defendant objects to submitting to examination by Plaintiffs' counsel while the motion to
4 disqualify him is pending;

5 Now, therefore, the parties hereby stipulate as follows:

6 The depositions of Defendant's Secretary-Treasurer Adam Ochoa and Defendant's
7 business agent Luis Diaz, noticed for August 2, are cancelled;

8 To allow time for the parties to complete discovery after the Court decides the motion to
9 disqualify, which is scheduled to be heard on August 29, the parties jointly request an extension
10 of the discovery deadlines by 60 days, which will reschedule the deadlines as follows:

11 Fact discovery cutoff: October 15, 2013;

12 Expert disclosures: December 3, 2013;

13 Expert rebuttal disclosures: December 31, 2013;

14 Expert discovery cutoff: January 21, 2014.

15 Respectfully submitted.

16
17 Dated: August 1, 2013

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

18 /s/ Anne I. Yen
19 By: DAVID A. ROSENFELD
20 ANNE I. YEN
21 Attorneys for Defendant,
22 TEAMSTERS LOCAL UNION NO. 948

23
24 Dated: August 1, 2013

LAW OFFICE OF KENNETH C. ABSALOM

25 /s/ Kenneth C. Absalom
26 By: KENNETH C. ABSALOM
27 Attorneys for Plaintiffs
28

1 Dated July 31, 2013

BEESON, TAYER & BODINE

2
3 /s/ Dalisai S. Nisperos

TEAGUE P. PATERSON

4 DALISAI S. NISPEROS

Attorneys for Defendant Joint Benefit Trust

5
6 **~~{PROPOSED}~~ ORDER**

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9 The Court having considered the above Stipulation of the parties, and good cause
10 appearing, the discovery deadlines in the above-captioned matter are hereby extended as follows:

11 Fact discovery cutoff: October 15, 2013;

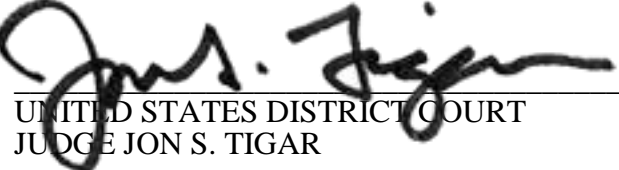
12 Expert disclosures: December 3, 2013;

13 Expert rebuttal disclosures: December 31, 2013;

14 Expert discovery cutoff: January 21, 2014.

15 IT IS SO ORDERED.

16
17 Dated: August 12, 2013

18 
UNITED STATES DISTRICT COURT
JUDGE JON S. TIGAR

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